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April 4, 2025

By ECF

The Honorable Lara K. Eshkenazi, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Pasquale J. Guerriero v. Diocese of Brooklyn et al.*,
Civ. No. 21-cv-04923-MKB-LKE

Dear Judge Eshkenazi:

We represent defendant The Roman Catholic Diocese of Brooklyn, New York (the “Brooklyn Diocese”). Pursuant to the Court’s March 17, 2025 order, we write to inform the Court that the parties mediated this case before the Hon. Peter B. Skelos on March 24, 2025. Although progress was made, the parties were ultimately unable to resolve this case.

We have met and conferred with counsel for all parties concerning a further discovery schedule in this case. The parties respectfully request that the Court enter the following schedule for the remainder of discovery:

- End of Fact Discovery: June 25, 2025
- Joint Status Report: July 2, 2025
- Disclose Affirmative Experts: July 11, 2025
- Disclose Rebuttal Experts: September 10, 2025
- Discovery End Date: November 10, 2025
- Joint Status Report: November 17, 2025
- Dispositive Motions: November 17, 2025

The parties are available for a status conference at the Court’s convenience. We thank the Court for its attention to this matter.

Respectfully,



Randall L. Morrison, Jr.

cc: All counsel of record (via ECF)